

# Memorandum

To : Mr. Lester Snow, Executive Director  
CALFED Bay-Delta Program

Date : February 5, 1996

From : Department of Fish and Game

Subject : Level of Detail Statement for Programmatic EIR/EIS

This in response to your January 30, 1996 request for a review of the first draft of the CALFED Bay-Delta Program Level of Detail Statement for the Programmatic EIR/EIS. We offer the following comments:

## General Comments:

There is a risk that the programmatic EIR/EIS will be too broad to be useful. We recommend that the Bay-Delta Program develop an approach that is as specific as possible so that some of subsequent specific projects won't require additional environmental documentation and permits obtained for the program will cover those actions as well. For example, the Suisun Marsh Diversion Screening Program environmental document was crafted to cover screening at over 75 sites in the Suisun Marsh. Screen impacts were discussed in a general, but complete manner and permits were obtained to cover installation impacts. No future environmental documentation will be needed for the individual site-specific screen installations. The Bay-Delta Program should strive for the same thing; a programmatic environmental document that provides a sufficient level of detail to avoid the need for additional project specific environmental documentation.

Limiting examples of other programmatic EISs to two is probably sufficient. The Refuge 2003 Program EIS and Los Padres National Forest EIS may be adequate examples to describe in the detail provided. Mentioning CVPIA in a more general way may be adequate.

**Page 2-2: First full paragraph:** Care needs to be taken when referring to water projects. A different choice of words should be used to avoid the implication that this programmatic document is simply for a water project.

**Page 2-4:** We need to be clear about which issues are subject to decisions and which are not yet ready to be decided.

Growth inducing impacts should also be addressed in a comprehensive and effective way that they won't need to be revisited for each project specific program.

**Page 2-5:** We suggest that the phrase "may be geographically dispersed throughout the State" be scaled back so that it keeps the focus on the Bay-Delta.

The draft document statement that implementation will be over several years is probably understated. Language that points out that implementation is expected to be long-term may be more accurate. For example, a much narrower scope effort in the Suisun Marsh has taken 10 years, and we expect the Bay-Delta effort will take significantly longer.

Add "programmatic" before "EIR/EIS" at end of first paragraph.

**Page 3-5:** Examples given may be confusing, the Tier 1 - Tier 3 shown could be confusing when discussing the Tier 1 vs Tier 2 of the Bay-Delta Program.

This concludes our input. We look forward to reviewing the next draft of this document. If you or your staff have any need for clarification, please contact Mr. Frank Wernette of our Bay-Delta and Special Water Projects Division at CALNET 8/423-7800.



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DFG/CALFED Bay-Delta Program Liaison

cc: Mr. Frank Wernette, BDD  
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